

REMARKS

I. Examiner Interview

Applicant's attorney appreciates the Examiner's courtesy in speaking with him on June 30, 2008, regarding the outstanding Non-Final Office Action. The interview included discussion of the §§ 102 and 103 rejections made by the Examiner. Applicant submits that the comments below reflect the substance of the interview.

II. Status

Claims 1, 8, 16, and 21-22 have been amended, and claims 25-30 have been added. No new matter has been added as a result. Claims 14 and 24 have been canceled. Accordingly, claims 1-13, 15-23, and 25-30 are currently pending.

III. Rejections Under 35 U.S.C. §§ 102 and 103

Claims 1-13, 15-19, 21, and 23 were rejected under 35 U.S.C. § 102(e) as being anticipated by Imagawa, et al. (U.S. 6,657,666).¹ Claims 14 and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Imagawa, et al. in view of Cazier (U.S. 6,657,661). Claims 22 and 24 were rejected under 35 U.S.C. §103(a) as being unpatentable over Imagawa, et al. in view of Baron (U.S. 6,459,388).

Claim 1 and Dependents

Claim 1 recites, *inter alia*, "wherein text representing the name of the municipality is displayed in the image free of a separate border surrounding the text." Imagawa, et al. do not teach or suggest at least this feature.

Imagawa, et al. disclose a shot apparatus, such as a video-camera or still-camera, in which a shot object and shot position can be displayed with a name of a country, a prefecture, and city as well as a proper or specific name of a mountain, river, or building. (Imagawa, et al., column 2, lines 19-23 and column 4, lines 41-48). Figures 3 and 4 of Imagawa, et al. show text or a name of shot positions and shot objects within a window or border that is displayed on top of a picture. A user can choose or select map position information of a shot place and a shot object, such as

¹ Applicant reserves the right to antedate the reference.

proper names, and record, reproduce, and/or display the information. (Imagawa, et al., column 9, lines 7-11).

However, Imagawa, et al. do not disclose that text representing a name of a municipality is displayed in the image *free of a separate border surrounding the text*. Imagawa, et al. show and teach that text or names regarding shot objects and places are in a boxed window or within a border that is separate than the underlying picture. (See Figures 3 and 4 of Imagawa, et al.). Placing text or names within such borders is opposite of Applicant's claimed feature.

Accordingly, Imagawa, et al. do not anticipate claim 1, and claim 1 is allowable for at least this reason. Claims 2-7 depend from allowable claim 1 and, therefore, are allowable for at least the same reasons.

Claim 8 and Dependents

Claim 8 recites, *inter alia*, "printing the image with text indicating the name of the municipality." The cited references do not teach or suggest at least this feature.

Imagawa, et al. do not teach or suggest *printing* an image *with* text indicating the name of a municipality. The Examiner asserts that Cazier discloses the claimed feature. (Office Action, page 7). Cazier discloses naming imaging files (file or path names) using a name of a location and a direction of the camera. (Cazier, column 1, lines 57-59 and column 2, lines 27-42). Cazier also discloses that by creating file names by using the name of a location and a direction of the camera, a user's ability to print, share, or display a particular image is greatly enhanced. (Cazier, column 1, lines 57-61).

However, even if one of ordinary skill in the art would have combined the references, the combined references do not teach or suggest printing the image *with text* indicating the name of the municipality. Cazier merely discloses that printing an image (not with text indicating the name of a municipality) is enhanced by creation of file names. Therefore, the printing feature of Cazier does not teach or suggest that the pictures of Imagawa, et al. are printed with text indicating the name of a municipality. Imagawa, et al. discloses that proper or specific names can be displayed or showed with a picture, but that does not mean that the names or text are part of the picture. For example, the names or text may be stored or recorded separately from respective pictures and may be superimposed or overlaid on the

respective pictures during display. Therefore, if the pictures of Imagawa, et al. are printed, they may be printed without the name or text used during display.

Accordingly, claim 8 is allowable for at least these reasons. Claims 9-13, 15, and 22 depend from allowable claim 8 and, therefore, are allowable for at least the same reasons.

Claim 16 and Dependents

Claim 16 recites, *inter alia*, “wherein the text indicating the name of the municipality is added to be a part of the image” and “storing the image having the text indicating the name of the municipality.” Imagawa, et al. do not teach or suggest at least these features.

Imagawa, et al. disclose displaying name or text information over a picture or image. (Imagawa, et al., column 7, lines 48-54 and Figures 3 and 4). The name or text information may be recorded and reproduced for display with the respective image. (Imagawa, et al., column 8, lines 42-62 and column 9, lines 7-11).

However, there is no teaching or suggestion that text indicating the name of a municipality is *added to be a part* of the image. The name and text content of Imagawa, et al. may be separate data that is superimposed or overlaid on the underlying image during display. The name and text content may not become an actual part of the underlying image.

Furthermore, there is no teaching or suggestion of storing the image *having* the text indicating the name of the municipality. Imagawa, et al. disclose recording and reproducing map position information or name and text content, but such information may be stored separately or as separate data from the underlying respective picture or image. For example, when the underlying picture is displayed, respective stored name or text content may be imposed or overlaid on the image rather than the image itself including the text or name content.

Accordingly, Imagawa, et al. does not anticipate claim 16, and claim 16 is allowable for at least these reasons. Claims 17-20 depend, directly or indirectly, from allowable claim 16 and, therefore, are allowable for at least the same reasons.

Claim 21 and Dependents

Claim 21 recites, *inter alia*, “taking a photograph via a camera,” “acquiring, by the camera, position information when the photograph is taken,” “associating, at the camera, the position information with a data representation of the photograph,” “sending the position information and the data representation of the photograph to a computing platform separate from the camera,” “querying, via the computing platform, a geographic database to determine a municipality in which the position is located based on the position information, the geographic database remote from the camera and the computing platform,” “receiving, at the computing platform, municipality content as a function of the query,” and “associating, at the computing platform, text indicating a name of the municipality with the photograph.” The cited references, in combination or alone, do not teach or suggest at least these features.

Accordingly, claim 21 is allowable. Claim 23 depends from allowable claim 21 and, therefore, is allowable for at least the same reasons.

New Claims 25-30

Claims 25-30 recite features that are not taught or suggested by the cited references. Accordingly, claims 25-30 are allowable.

IV. Summary

It is respectfully asserted that all of the pending claims are patentable over the cited references, and allowance of the pending claims is earnestly solicited. If the Examiner believes that a telephone interview would be helpful in resolving any outstanding issues, the Examiner is respectfully invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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